

**REMARKS**

Claims 16, 17, 19-21, 24, and 32-34 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the remarks.

Claims 16, 17, 19, 20 and 32-34 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky et al. (US Application No. 2003/0190054) in view of Takashi et al. (US Application No. 2002/0059162) and further in view of Lemay et al. ("Laura Lemay's Web Workshop Creating Commercial Web Pages", Sams.net, 1996, pp.110-115) and further in view of Truong (U.S. Patent No. 6,151,609), and further in view of Levy et al. (US Application No. 2003/0012548). The Examiner stated essentially that the combined teachings of Troyansky, Takashi, Lemay, Truong, and Levy teach or suggest all the limitations of Claims 16-20.

Claim 16 claims, *inter alia*, "converting, automatically by the server, the textual content in text format to the textual content in the image format according to the content creation preference; storing the textual content in the image format; generating an HTML document containing an inline reference to the stored textual content in the image format for retrieval and dynamic assembly by the client; and replying to the

request by serving the HTML document containing the inline reference to the stored textual content in the image format, wherein the reply does not include the textual content in the image format."

Troyansky teaches a system and method for providing uniquely marked copies of data content via digital watermarks (see Abstract and paragraph [0124]). Troyansky does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format for retrieval and dynamic assembly by the client" as claimed in Claim 16 (emphasis added). Troyansky teaches a content processor that forms the sets of marked segments prior to distribution of the data content (see paragraph [0114]).

Troyansky does not teach or suggest generating an HTML document containing an inline reference to the stored textual content in the image format, as claimed in Claim 16. The assembly of Troyansky is performed by a server (see for example, FIG 3) – no inline reference is taught as the client does not perform assembly. Therefore, Troyansky does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format", essentially as claimed in Claim 16. Therefore, Troyansky fails to teach or suggest all the limitations of Claim 16.

With regard to the *Response to Arguments* at pages 7-8 of the Final Office Action, the Examiner suggests that "Troyansky teaches replacing part of an HTML --text-- document with an image --determining a content creation preference--" is analogous to "HTML marked up text is converted from text format into an image format." Even, assuming *arguendo*, that Troyansky replaces content, replacement of content is not analogous to "converting, automatically by the server, the textual content in text format to the textual content in the image format" as claimed in Claim 16. Troyansky clearly shows that portions of content are "removed and deleted" (see FIG 3) - replacement in no way modifies this loss of content. The original content of Troyansky's HTML document is lost (through removal and deletion) to the new content of the embedded mark. It should also be noted here that the mark of Troyansky is embedded into the data stream, whereas Claim 16 recites "generating an HTML document containing an inline reference." An embedded mark clearly does not employ and "inline reference." Returning to the claimed conversation of content, Troyansky's removal and deletion of content in no way teaches or suggests converting content much less "generating an HTML document containing an inline reference to the stored textual content in the image format." Replacement is not analogous to conversion. It is important to note that the claimed invention includes "converting,

automatically by the server, the textual content in text format to the textual content in the image format." Therefore, Troyansky's method of removing and deleting content is not analogous to the claimed invention.

Takashi teaches a system and method for searching for a mark in an image; the mark is embedded by a server in a Web page created by the server such that the mark is difficult to perceive by a human (see Abstract and paragraph [0007]).

Takashi does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format" as claimed in Claim 16. Takashi teaches that information is transmitted to a client with a mark image embedded therein; the server creates the Web page for the client (see paragraph [0022]). Takashi's method of creating marked information is performed by a server. A client of Takashi does not assemble a Web page. Thus, Takashi does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format" as claimed in Claim 16. Therefore, Takashi fails to cure the deficiencies of Troyansky.

Lemay teaches a web page including an image (see page 111). Lemay does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format" as claimed in Claim 16. Lemay merely

teaches a basic layout of a web page. Lemay does not teach an inline reference to stored textual content in an image format, essentially as claimed in Claim 16. Therefore, Lemay fails to cure the deficiencies of Troyansky and Takashi.

Truong teaches an editor for remotely editing text files on a remote Internet server (see Abstract). Truong does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format" as claimed in Claim 16. Truong teaches editing a text file stored on a server and served as a complete assembled Web page (see element 106 of Figure 3B). Truong does not teach or suggest an inline reference to stored textual content in an image format, essentially as claimed in Claim 16. Therefore, Truong fails to cure the deficiencies of Troyansky, Takashi and Lemay.

Levy teaches a method by which a server performs integration of a watermark in content (see paragraph [0093]). Levy does not teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format" as claimed in Claim 16. In Levy's method a client is a creator of content and watermarked content, e.g., the Society of Motion Picture and Television Engineers or those desiring to tailor audio or video content presented to consumers (see paragraphs [0078] and [0033]). This type of client is very different from the client of Claim 16. For example, the client

of Claim 16 is a requestor of content from the server. Levy's client is a provider of content to the server. More particularly, Levy teaches that content, a watermark and watermark parameters are sent to a server for integration and returned as a complete document for later broadcast to consumers. Clearly then, this is not analogous to retrieval and inline dynamic assembly by the client, essentially as claimed in Claim 16 - Levy does not teach an inline reference.

In addition, it is clear from the teachings of Levy that the word "render" as used in paragraph [0094] refers to the playback of content by a server to a client. For example, see paragraphs [0021] and [0024], wherein rendering is specifically defined as "playback" (see paragraph [0021]), which is "rendering to the user" (see paragraph [0024]). Accordingly, the portions of paragraph [0094] that refer to placing an image in a web page at "render time" are preformed by the server and not the client, which is consistent with the rest of the disclosure of Levy. Indeed, the explicit disclosure of Levy teaches that the page is rendered by and at the server and displayed by the client (see Abstract - "upon rendering rather than receipt") - the word "render" as used by Levy is not synonymous with "display." To render means to merely cause to be or provide - by which Levy teaches that a web page is rendered by the server and displayed by the client.

Therefore, Levy fails to cure the deficiencies of Troyansky, Takashi, Lemay, and Truong.

The combined teachings of Troyansky, Takashi, Lemay, Truong and Levy teach a server embedding content into data. Therefore, the combined teachings of Troyansky, Takashi, Lemay, Truong and Levy fail to teach or suggest, "generating an HTML document containing an inline reference to the stored textual content in the image format" as claimed in Claim 16.

Applicants also note, that in general, the Troyansky, Takashi, and Levy seem to be concerned with watermarks. Watermarks introduce information, by changing content, that is difficult to detect. The claimed invention is directed to "converting electronically encoded HTML textual content from a text format to an image format." None of the cited references teach or suggest the conversion of textual content. Troyansky is exemplary in this respect; Troyansky removes and deletes content to make room for the embedded mark, see for example, paragraph [0003], wherein Troyansky states that steganography generally works by replacing parts of the information in digital files with different information. Additionally, neither Lemay nor Truong teach or suggest converting electronically encoded HTML textual content from a text format to an image format, as claimed in Claim 16. The combination of Troyansky, Takashi,

Lemay, Truong and Levy fails to teach or suggest the claimed conversion.

Claims 17-20 and 32-34 depend from Claim 16. The dependent claims are believed to be allowable for at least the reasons given for Claim 16.

The Examiner's reconsideration of the rejection is respectfully requested.

Claim 21 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky, in view of Takashi, in view of Lemay, and further in view of Truong, and further in view of Levy, and further in view of "Adobe PageMill 2.0 Handbook", Lewis, R., Hayden Books, 1996, pp. 138-143 (hereinafter PageMill). The Examiner stated essentially that the combined teachings of Troyansky, Takashi, Lemay, Truong, Levy, and PageMill teach or suggest all the teachings of Claim 21.

Claim 21 depends from Claim 16. Claim 21 is believed to be allowable for at least the reasons given for Claim 16. The Examiner's reconsideration of the rejection is respectfully requested.

Claim 24 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky, in view of Takashi, in view of Lemay, and further in view of Truong, further in view of Levy,

and further in view of Minematsu (U.S. Patent No. 6,700,993).

The Examiner stated essentially that the combined teachings of Troyansky, Lemay, Truong, Levy, and Minematsu teach or suggest all the teachings of Claim 24.

Claim 24 depends from Claim 16. Claim 24 is believed to be allowable for at least the reasons given for Claim 16. The Examiner's reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the application, including Claims 16, 17, 19-21, 24, and 32-34, is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

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